

LIST OF DOCUMENTS REQUESTED FOR REVIEW

GENERAL PROCEDURE

EPA's compliance evaluation will generally proceed in two stages. First, EPA will identify facility information, documents and records to locate and review. Generally the review will cover events dating back three years from the present, but some requests will cover specific time periods. Second, EPA, or its representative, will review the information, documents and records at the facility and request copies, as needed.

REQUEST FOR INFORMATION

Please make the following information, documents and records for the entire facility, or facilities, referenced above available for review during the EPA inspection visit. If you are unable to provide some of the information, documents or records requested by the time the inspectors arrive at the facility, please provide copies to EPA by mail within 30 days of your receipt of this letter.

GENERAL QUESTIONS

1. Provide a facility map and plot plan.
2. Provide a management organizational chart (include identification of personnel with environmental responsibilities).
3. Describe the facility and operations; Provide a Block Flow Diagram of the facility's regulated process(es).
4. Provide copies of any enforcement actions/notices of violation (NOVs) brought against you by any state or federal agency within the last three years.
5. Provide copies of consent decrees/orders/agreements and related correspondence related to any enforcement action or notice of violation brought against you by any state or federal agency within the last three years.
6. To the extent that there are any documents that are responsive to this request that you are withholding for any reason, you should identify the document and state your basis for withholding the document. To the extent that you do not respond to any request, please describe your basis for withholding the information.
7. For each and every question contained in this letter, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained. For each individual, please provide the following: name, last known or current address, telephone number, and affiliation with your company or the Site.

**COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND
LIABILITY ACT (CERCLA)/EMERGENCY PLANNING AND
COMMUNITY RIGHT-TO-KNOW (EPCRA)**

1. Identify all releases of all hazardous substances at the facility for the last five years. For each release:
 - a. Identify each chemical released, concentration and amount of each chemical released (in pounds),
 - b. Identify how that quantity was determined including any calculations, estimations or assumptions relied upon in making your conclusions, and documentation supporting that conclusion, such as log books, monitoring equipment print-outs, etc.
 - c. Specify the date and time each release began and ended by month, day and year on a 24-hour clock.
 - d. Describe what initiated each release.
 - e. Provide all documents reflecting notification of, or communication with "911", the Local Emergency Planning Committee (LEPC), the State Emergency Response Commission (SERC), the National Response Center (NRC) and/or other local authorities regarding each release. Identify the date and time of each notification and communication, including follow-up notifications.
 - f. Describe steps taken by you or your agents to mitigate the release and manage the hazardous substances released, including any hazardous waste manifests generated during removal actions.
2. Provide all documentation regarding the initial and any subsequent submissions of Material Safety Data Sheets (MSDS) or lists of MSDSs to the SERC, LEPC, and local Fire Department.
3. Provide documentation regarding the annual submission of chemical emergency planning and inventory information (i.e., Tier II information) for the previous three reporting years to the SERC, LEPC, and local Fire Department.

CLEAN AIR ACT SECTION 112(r)(7) - RISK MANAGEMENT PLAN

1. Provide copies of each supporting document used in development of the Risk Management Plan and example documentation to demonstrate implementation of the prevention program for the facility as required under CAA §112(r), as described in 40 CFR Part 68 Subparts B, C and D. Example documentation to demonstrate implementation might include, but not be limited to, inspection logs, training program sign-in sheets, work orders, tracking information on completion of recommendations made during process hazardous analysis process. For each covered process

provide this information for each of the required components of the risk management plan, as described in 40 CFR Part 68 Subparts B, C and D:

- a) Management System (40 CFR §68.15);
- b) Hazard Assessment (40 CFR §68.20-42) - including all background information used to develop the facility Offsite Consequence Analysis;
- c) Process Safety Information (40 CFR §68.65);
- d) Process Hazard Analysis (40 CFR §68.67) - including last two PHAs/revalidations and resultant action items tracking/status;
- e) Standard Operating Procedures (40 CFR §68.69);
- f) Operator Training (40 CFR §68.71);
- g) Mechanical Integrity (40 CFR §68.73) – including Inspection, Testing and Preventive Maintenance Plan (or equivalent) and bases, ITPM procedures and training, and ITPM records;
- h) Management of Change (40 CFR §68.75) - including all paperwork for all MOCs initiated in accordance with your facility's policy since Jan. 2011;
- i) Pre-startup Safety Review (40 CFR §68.77) - including all paperwork for all PSSRs initiated in accordance with your facility's policy since Jan. 2011;
- j) Internal Compliance Audits (40 CFR §68.79) - including the last two audit reports and resultant action items tracking/status;
- k) Lists of Near-Miss and Incident Investigation Reports for the previous three years (40 CFR §68.81) - and associated tracking/corrective action tracking/status (note: EPA will identify near-miss and incident report for which copies of the complete investigation files will be required for review);
- l) Employee Participation (40 CFR §68.83);
- m) Hot work permits issued since Jan. 2011 (40 CFR §68.85);
- n) Contractor Safety (40 CFR §68.87);
- o) Emergency Response/Action Plan (40 CFR §68.90-95);
- p) Documentation of coordination of emergency response plan with LEPC (including any memorandum of agreement or mutual aid agreement).